![QQI – Quality and Qualifications Ireland / Dearbhú Cáilíochta agus Cáilíochtaí Éireann]

Provider Access to Initial Validation of Programmes leading to QQI Awards
Report of the Quality and Capacity Evaluation Panel

Stage 1
Assessment of Capacity and Approval of QA Procedures

Part 1   Details of applicant provider and its proposed education and training provision

1.1   Applicant Provider

Registered Business/Trading Name:	Royal College of Physicians of Ireland
Address:	Frederick House, 19 South Frederick St., Dublin 2
Date of Application:	26th September 2019
Date of resubmission of application:	1st March 2021
Date of (virtual) site visit:	2nd July, 2020
Date of Panel reconvene meeting (if applicable)	30th March 2021
Date of recommendation to the Approvals and Reviews Committee:	27th August 2020 and 20 May 2021

1.2   Profile of applicant provider

The Royal College of Physicians of Ireland (RCPI) was established in 1654. It is the largest postgraduate medical training institution in Ireland, and houses six of thirteen accredited training bodies in the sector.

RCPI's core activity is the provision of training programmes at the levels of Basic Specialist Training (BST) and Higher Specialist Training (HST). These programmes are accredited by the Medical Council. BST programmes include General Internal Medicine, Paediatrics, Obstetrics and Gynaecology, and Histopathology. HST Programmes, which prepare doctors to work at the most senior level, are numerous and include: Cardiology, Clinical Genetics, Clinical Microbiology, Chemical Pathology, Clinical Pharmacology and Therapeutics, Dermatology, Endocrinology and Diabetes Mellitus, Gastroenterology, General Paediatrics, Genito-Urinary Medicine, Geriatric Medicine, Haematology, Histopathology, Immunology, Infectious Diseases, Medical Oncology, Neonatology, Nephrology, Neurology, Neuropathology, Obstetrics and Gynaecology, Occupational Medicine, Paediatric Cardiology, Palliative Medicine, Pharmaceutical Medicine, Public Health Medicine, Rehabilitation Medicine, Respiratory Medicine and Rheumatology. RCPI additionally hosts a range of conference and masterclass events.

RCPI's application for Initial Access to Validation relates in the short-term to its continuing professional development programmes. These are provided for doctors and other health professionals. RCPI intends to offer a range of programmes at Level 9 on the National Framework of Qualifications (NFQ) in the area of medical education, and to initially apply for validation of a Certificate in Leadership and Quality in Healthcare, Special Purpose Award (30 ECTS). RCPI will then expand its range of QQI validated programmes in areas that are part of the quality agenda.

Quality assurance (QA) of the provision of education and training for these programmes is considered a priority for RCPI. The policies and procedures in the QA documentation as they pertain to the continuing professional development programmes are therefore designed to align with QQI's Statutory Quality Assurance Guidelines (2016).

1.3 Proposed education and training provision

NFQ Level	Award Class	QQI Award / Proposed Programme Title
9	Major, SPA, Minor	Healthcare
Face to Face, Blended, Part-time		

Part 2 The Quality and Capacity Panel Membership

Name	Role of panel member	Organisation
Prof. Damien Walmsley	Chair	Director of Global Engagement, University of Birmingham
Dr. Catherine Peck	Report Writer	Independent Education Consultant
Prof. Colin Bradley	QA and Subject Matter Expert	Head of Dept. of General Practice, University College Cork
Prof. Viren Naik	QA and Subject Matter Expert	Director of Assessment, Royal College of Physicians and Surgeons of Canada
Assoc. Prof. Tara Cusack	QA Expert	School of Public Health Physiotherapy, Sports Science, University College Dublin
Dr. Silvia Gallagher	Blended Learning Expert	Research Fellow, Trinity College Dublin
Dale Whelehan	Learner Representative	PhD Candidate, Trinity College Dublin

Part 3   Findings of the Panel

3.1   Summary Findings

The panel would first like to commend RCPI for pursuing an application for Initial Access to Validation (IAV) with QQI, with a view to ensuring the College's members benefit from recognition of their qualifications within the European Credit Transfer and Accumulation System (ECTS). The commitment and dedication of the team at RCPI to delivering excellence in education and training was very evident to the panel throughout various meetings held with College representatives in the course of a virtual site visit.

RCPI's application documentation acknowledged the significant change and development that was underway in the organisation in the lead up to the submission. This had followed a previously external review commissioned by the College. The panel notes that this process reflects a commendable emphasis on continual enhancement at RCPI.

During the virtual site visit, the panel held discussions with representatives of RCPI engaged in leadership, management, teaching, administration and support roles. The panel used this opportunity to explore how embedded the quality system was within RCPI, to seek clarifications on specific issues within the application documents and to gain additional insights into RCPI's strategic rationale for pursuing the IAV application.

At the conclusion of the virtual site visit, the panel were of the view that RCPI was well-regarded and had a track record of delivering excellent programmes. However, the draft QA presented, while extensive, did not always reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines (2016). The specific areas in which RCPI's draft QA procedures diverge from QQI's guidelines are discussed in the relevant subsections of this report and are reflected as *Mandatory Changes* in Section 7.1. Additional items of *Specific Advice*, directed toward enhancement of the draft QA procedures, are included in Section 7.2.

The panel was of the view that the required changes highlighted in this report could be implemented by RCPI within an allocated period of six months. The panel expressed their full confidence in RCPI's capacity and capability to make the required adjustments and offered their encouragement to the College in pursuing the IAV application.

The panel reconvened on 30 March 2021 after conducting a desk review of the revised Quality Assurance Manual of RCPI. The panel commended the standard and extent of work undertaken by the provider during the interim period. The panel would like to acknowledge not only the significant enhancements made by RCPI to the institution's documented QA procedures, but the achievement of those enhancements during a period of extreme disruption due to the Covid-19 pandemic. Following a review of the evidence submitted, the panel was pleased to recommend approval of RCPI's draft QA procedures to QQI.

3.2   Recommendation of the panel to Approvals and Review Committee of QQI

	Tick <u>one</u> as appropriate
Approve RCPI's draft QA procedures	X
Refuse approval of RCPI's draft QA procedures **pending mandatory changes** set out in Section 6.1 (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	
Refuse to approve RCPI's draft QA procedures	

Part 4   Evaluation of the capacity of the applicant to provide quality education and training to learners

4.1   Legal and compliance requirements:

	Criteria	*Yes/No/Partially*	*Comments*
4.1.1(a)	**Criterion:** *Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*	**Yes**	RCPI is a well-established legal entity with a long history of provision of education and training in its domain.
4.1.2(a)	**Criterion:** *Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*	**Yes**	RCPI has submitted the RCPI Charter 1692, and documentation detailing an amendment to that charter in 1979. Confirmation of the continuation of charitable status for RCPI has also been submitted.
4.1.3(a)	**Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*	**Yes**	RCPI collaborates with TU Dublin on the delivery of a Histopathological Dissection Programme. RCPI's responsibilities within this collaboration are clearly specified in the application form.
4.1.4(a)	**Criterion:** *Are any third-party relationships and partnerships compatible with the scope of access sought?*	**Yes**	There is no impact of relationships and partnerships specified with the scope of access sought by the provider.
4.1.5(a)	**Criterion:** *Are the applicable regulations and legislation complied with in all jurisdictions where it operates?*	**Yes**	The evidence provided in support of RCPI's application is indicative of compliance with Irish/EU legislation.
4.1.6(a)	**Criterion:** *Is the applicant in good standing in the qualifications systems and education and training*	**Yes**	RCPI is well-established and respected as a provider of programmes of education and training. The provider is in good standing and currently

	systems in any countries where it operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.		accredits multiple programmes via the Medical Council.

Findings

The evidence submitted is wholly consistent with RCPI meeting this Criteria in full. RCPI is a very well-established institution with a significant track record of delivering programmes of education and training.

4.2 Resource, governance and structural requirements:

	Criteria	Yes/No/Partially	Comments
4.2.1(a)	**Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*	**Yes**	RCPI has submitted appropriate evidence in the form of an Extract of Accounts YE 30.06.18, Tax Clearance Confirmation and Public Liability Insurance information.
4.2.2(a)	**Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*	**Yes**	RCPI currently offers comparable non-accredited programmes as part of its suite of continuing professional development options, and there is an established and ongoing need for programmes in this area.
4.2.3(a)	**Criterion:** *Are fit-for-purpose governance, management and decision making structures in place?*	**Yes**	At the time of the initial site visit, the panel was not satisfied that RCPI had governance structures in place that reflected QQI's guidelines. This is discussed further in Section 5.1 of this report. When the panel reconvened in March 2021, appropriate adjustments had been made to the governance structures outlined in the draft QA procedures. These revised structures reflected an appropriate separation between commercial and academic decision-making.
4.2.4(a)	**Criterion:** *Are there arrangements in place for providing required information to QQI?*	**Yes**	The panel is satisfied that the provider's track record of accreditation with the Medical Council and internal structures reflect a sound capacity to provide required information to QQI.

Findings

Following the reconvened meeting of the panel in March 2021, the panel was of the view that RCPI has met the sub criteria in full.

4.3   Programme development and provision requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.3.1(a)	**Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*	**Yes**	RCPI has significant experience and a track record in the provision of programmes of education and training.
4.3.2(a)	**Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*	**Yes**	At the time of the initial site visit, the panel was confident that RCPI employed experienced and expert faculty, supported by a stable complement of education staff within the College. However, the panel was of the view that further development was needed to ensure processes for the contextually appropriate performance management and ongoing professional development of faculty are transparent and documented. When the panel reconvened in March 2021, the panel was satisfied that the revised processes presented by RCPI had satisfactorily addressed this concern.
4.3.3(a)	**Criterion:** *Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and*	**Yes**	The panel is satisfied that the provider's track record of accreditation with the Medical Council and approach to the Initial Access to Validation process reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) of the 2012 Qualifications and Quality Assurance (Education and Training) Act.

	Training) Act (2012) (the Act)?		
4.3.4(a)	**Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?*	**Yes**	Due to the Covid-19 pandemic, the site visit for this evaluation was conducted virtually, and the panel members did not undertake a site visit to RCPI's premises. RCPI submitted an overview of its classrooms and facilities with its application, and has a track record of utilising these spaces to deliver comparable programmes of education and training to those within its proposed scope of provision.
4.3.5(a)	**Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*	**Yes**	The panel is satisfied that the arrangements presented are in line with QQI's criteria.
4.3.6(a)	**Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*	**Yes**	At the time of the initial site visit, the panel was of the view that an overarching assessment policy which made explicit what the QA processes were around this area of practice was needed. When the panel reconvened in March 2021, RCPI presented documentation in this area that satisfied the panel's concerns.
4.3.7(a)	**Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*	**Yes**	RCPI has committed within its Policy for Protection of Enrolled Learners to examining each programme it validates to determine whether alternative provision is possible, or to refund fees where this is not possible. RCPI commits to providing QQI with details of the PEL arrangements in place when submitting a programme for validation and has established a Procedure for Protection of Enrolled Learners within its QA system.

Findings

Following the reconvened meeting of the panel in March 2021, the panel was of the view that RCPI has met the sub criteria in full.

4.4   Evaluation of capacity to provide the proposed education and training provision - Overall finding:

Following the initial site visit, the panel was of the view that RCPI had met the majority of the Criteria in Section 4 relevant to the College's capacity to provide sustainable education and training. Appropriate evidence was submitted as part of the application and was indicative of RCPI's compliance with legal requirements and sufficient resource base.

Specific areas of vulnerability were identified in relation to some of the sub criteria. These related specifically to the following dimensions of QA: Governance and Management, Staff Recruitment, Management and Development and Assessment of Learners. These are discussed in further detail in the relevant sections of this report and identified as *Mandatory Changes* in section 7.1.

The panel reconvened on March 30, 2021 to review the evidence submitted by RCPI that those mandatory changes had been implemented. The panel were satisfied that the evidence submitted by RCPI reflected significant enhancements to RCPI's draft QA procedures and reflected a wholly appropriate implementation of the mandatory changes.

Part 5   Evaluation of draft QA Procedures submitted by Royal College of Physicians of Ireland (RCPI)

The following is the panel's findings following evaluation of RCPI's quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016) and Topic Specific QA Guidelines - Blended Learning. Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

1   GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines under this dimension of QA require providers to have governance structures in place that enforce a separation of commercial and academic decision-making. Within RCPI, the President and Fellows constitute the Body Corporate of RCPI and are the ultimate authority within the college. The Body Corporate delegates its authority to Council at each Annual Stated Meeting. Delegated authority is therefore held by the Council to control and supervise the activities and affairs of the College. An Executive Board (EB) oversees the operation and management of RCPI in accordance with the By-Laws and strategy set by the Council. An Education and Quality Committee (EQC) reports to the EB. Prior to the virtual site visit, the panel held concerns that the Terms of Reference for both the EB and the EQC reflected involvement of both units of governance in commercial decision-making (for example, considering the business case for/financial viability of programmes). This meant that within the documented QA there was no visible committee or board within the College that was tasked exclusively with the development, maintenance and protection of academic standards within the College, and which reported directly to the Council. The panel acknowledged that as a not-for-profit organisation and registered charity that RCPI does not operate within a purely commercial framework and may make decisions on the basis of the value of a programme offering to the community. For example, RCPI representatives noted that programmes may be delivered by the College which are not highly profitable on the basis that they contribute to or serve the College's Trainees, Members, Fellows and other health professionals. However, the College's not-for-profit status does not negate its obligation to have structures in place that demonstrate a separation between corporate and academic decision-making. The panel therefore issued a *Mandatory Change* (7.1.1) pertaining to this in this report.

QQI's guidelines also require providers to clearly identify the roles and positions responsible for the implementation of QA processes. In advance of the virtual site visit, clarifications were sought by the panel members regarding, for example, which unit of governance (the EB or EQC) approved QA policies and procedures, and where the representation of learners could be found within the governance structure. During the virtual site visit meetings, panel members explored these and other questions with RCPI's representatives and acknowledged the prompt clarifications that were provided by College's representatives. However, the responses to these queries indicated some omissions or inconsistencies in the documentation that need to be addressed. The ongoing enhancement process at RCPI, which the panel encourages and supports, presented an additional challenge to the up-to-date representation of the College's governance and management structures at the time of the virtual site visit. RCPI confirmed that the implementation of recommendations for its governance and management structure from a review undertaken in 2017 was ongoing. Further changes were anticipated yet were not reflected in the documentation presented to the panel, for example, the creation of the role of Registrar within the College. Although the panel supported the commitment to improved governance that this process represented, the panel was unable to clearly evaluate or approve a structure that was not yet finalised or fully presented. The panel therefore issued *Specific Advice* (7.2.1) pertaining to this in this report, with the aim of strengthening this element of RCPI's resubmission following the 6-month interim period.

A further requirement of QQI's guidelines that relates to this dimension of QA and also to Supports for Learners is the participation of learners in the QA system, and mechanisms for learner representation within the governance of the College. The panel acknowledged RCPI's confirmation during the site visit that learners were represented on the EQC, despite the omission of this from the EQC Terms of Reference that had been submitted. However, following discussions with RCPI representatives throughout the day the panel was of the view that learner representation overall needed to be further developed across the College's structures and processes. The panel advised that learner representation should be considered independent to trainee representation. Where possible, learner representatives should be peer elected and receive appropriate training for their roles to ensure that the College's decision-making consistently benefits from consideration of learner voices and perspectives. The panel therefore issued a *Mandatory Change* (7.1.2) pertaining to this in this report.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed initial concerns pertaining to the separation of academic

and commercial decision making within revised reporting relationships and Terms of Reference for the units of academic governance. Additionally, RCPI presented documentation that reflected increased learner representation across the governance structure as well as the self-evaluation, monitoring and review processes within the organisation.

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines under this dimension of QA require providers to have fully documented and robust policies and associated procedures for the assurance of the quality and standards of provision. These must be informed by QQI's guidelines and available to staff and the public as required in usable formats. Further, they should be reviewed periodically to ensure they remain effective. The panel would like to acknowledge the significant volume of documentation submitted by RCPI, and the substantial work that preparing for the IAV process represents for providers. The panel was of the view that the documents submitted represented a commitment to quality and a clear capacity within RCPI to develop its processes in alignment with QQI's guidelines. However, some adjustments remained necessary in relation to this area of the College's application.

The panel notes that the overall structure of the QA Manual was not conducive to easy evaluation using QQI's Core Statutory Quality Assurance Guidelines. As RCPI plan to validate a suite of programmes with QQI, the College was advised to consider how the structure of the document might be adjusted to reflect QQI's criteria moving forward. The panel advised that detailed terms of reference for committees, boards and other units of governance could usefully be included in the chapter on governance and management. Similarly, the panel advised that it would be helpful if the presentation of units of governance could precede and not be interspersed with descriptions of individual roles. Management structures and individual roles and responsibilities could be presented following the outline of the College's governance structure. The panel noted that QA resources (for example, forms, templates and technical instructions) are not required within the QA Manual, but more typically presented in a separate document of appendices. However, RCPI could usefully include accompanying flowcharts or graphics alongside key procedures.

In addition, the panel noted that within a comprehensive and unified QA manual, definitions for key terms (for example, QQI and RCPI) should be presented once and not repeated throughout. Such adjustments would significantly aid readability and navigability of the documentation for users. Within the

documentation presented by RCPI, document control sheets were also incomplete. This meant that the panel had no indication of document history or review processes, and no tracked evidence of periodic review undertaken previously or scheduled for the future. The panel therefore issued a *Mandatory Change* (7.1.3) pertaining to this in this report.

Mandatory Change 7.1.3 also required that within the College's review of its documentation, RCPI ensures its processes are consistently aligned to QQI's guidelines. This will facilitate RCPI's future applications for the validation of programmes of education and training. At the time of the site visit, for example, RCPI's process for managing major changes to programmes did not make reference to the significant QQI process that such a change initiates. Similarly, the College's processes pertaining to assessment rechecks, reviews and appeals did not align to the definitions of these provided in Assessment and Standards, Revised 2013. Such discrepancies needed to be self-identified and addressed by the College throughout the documentation prior to resubmission.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed initial concerns pertaining to the alignment of the documentation presented with QQI's guidelines and had also updated the tracking and control measures for its QA documentation.

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the course of its evaluation, the panel reviewed the information presented by RCPI in relation to Access, Transfer and Progression including Recognition of Prior Learning (RPL). RPL is assessed by an education specialist, who sits on the relevant Programme Steering Group, and this occurs in consultation with the relevant clinical lead as appropriate. The decision to approve or refuse an application for RPL is signed off by the chair of the steering group. The principles that inform decision-making, for example, the validity, relevance, currency, reliability, sufficiency and NFQ level of prior learning are outlined in the documentation.

QQI's guidelines under this dimension of QA require that programme delivery is monitored in a way which allows for the identification of needs and the modification and adjustment of the programme and delivery method as appropriate. During the virtual site visit, the panel discussed the processes in place to facilitate programme monitoring and review with RCPI's representatives. The Programme Steering Group oversee this at the College, and a faculty workshop is held at the end of course to collate lecturer feedback and consider data from learner feedback collated throughout the course in order to identify and plan potential improvements. RCPI representatives indicated that Programme Steering Groups may include learner representatives, but not current learners. The panel queried whether current learners could be invited to contribute in this forum, with closed business being defined if necessary in relation to assessment. The panel identified an item of *Specific Advice* in relation to how RCPI may progress learner feedback (see 7.2.2). Programme Improvement Plans outlining changes to be made as an outcome of monitoring activities are sent to the EQC. The panel was of the view that Programme Quality Improvement Plans should be informed by learner feedback and reviewed by the Programme Steering Group and faculty on an annual basis. The panel noted that within the processes for programme monitoring and review there was a need to reference the initiation of a QQI process where major changes to a programme are identified. This has been discussed within Section 5.2 and is addressed within *Mandatory Change* 7.1.3.

QQI's guidelines pertaining to Programmes of Education and Training also require the development of new programmes to be systematic, and to include an evaluation of new programmes by the appropriate

internal decision-making structures. In discussions with RCPI representatives during the site visit, the panel sought to understand in more detail how programmes were developed at RCPI. The College's representatives outlined a well-developed process that facilitates faculty and content experts working with education specialists and learning technologists early in the process and is informed by learners. The panel noted that the separation of commercial and academic decision-making at the level of approval for new programmes is also relevant to the programme development and approval process. This has been discussed in Section 5.1 of this report and addressed in *Mandatory Change* 7.1.1.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed its initial concerns pertaining to the programme development process. However, the panel has identified one minor condition for the provider pertaining to this. RCPI additionally presented documentation that reflected increased learner representation across the governance structure as well as the self-evaluation, monitoring and review processes within the organisation.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

RCPI's QA includes policies for Recruitment and Selection, Performance Improvement, Training and Development, and New Hire Induction. During the virtual site visit, the panel sought to understand how these policies were implemented in practice, and to gain clarity on how the College formally committed to the appointment of suitably qualified staff in teaching roles as per QQI's Core Statutory Quality Assurance Guidelines. QQI's guidelines require the appraisal of teaching ability to be a key part of selection procedures for any persons employed to teach learners, and for processes to be in place to ensure pedagogical standards for teaching staff are maintained.

During these discussions, the panel queried how faculty or staff in teaching roles were inducted to teaching and learning, and Blended Learning, at the College. The College is dependent on a large body of

teachers, many of whom may have only a small commitment to teaching in the College. Most have had specific training in teaching and learning. RCPI's representatives noted that most of their teaching faculty were trainers and therefore going through training to become trainers and held significant experience in the field. Teaching faculty are asked if they need additional support and if training is requested, it is provided. However, the College require mechanisms to ensure the competences in education of their faculty. The panel also sought to understand how the ongoing or Continuous Professional Development of staff was managed at RCPI, including the sharing or dissemination of good practice. RCPI's representatives confirmed that this was a challenge to achieve at programme level as not all staff are on site at the same time, and so sustainable ways to achieve this were required. The College was encouraged to seek support from the National Forum for Teaching and Learning in this area.

The panel acknowledge the track record and reputation of RCPI as a provider of programmes of education and training. However, the panel was of the view that further development of transparent and formal processes, appropriate to the context of provision, was required in this area of the College's QA. The panel therefore issued a *Mandatory Change* (7.1.4) pertaining to this in this report.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed its initial concerns pertaining to this dimension of QA. RCPI presented procedures for the recruitment, selection and development of teaching faculty as well as expanding its suite of online self-access resources and supports.

5   TEACHING AND LEARNING

Panel Findings:

The panel is of the view that RCPI has satisfied QQI's requirements in relation to this dimension of QA.

QQI's Core Statutory Quality Assurance Guidelines require providers to have processes in place to ensure that the content of programmes reflects advances in relevant disciplines and that the pedagogic style incorporates national and international effective practice. RCPI have a team of educationalists who work with faculty to develop the subject matter expert content they provide for pedagogic purposes. Emphasis is placed on engaging learners, particularly in the context of online provision (see Section 5.12 for a discussion of Blended Learning). RCPI articulate a commitment to learner-centred teaching and learning practices within their QA documentation.

QQI's guidelines under this dimension of QA also require providers to ensure that programme learning environments are appropriate, and that the effectiveness of a provider's facilities, equipment and premises are regularly reviewed to ensure their continuing adequacy and effectiveness. Due to the impact of the COVID-19 pandemic, the panel were unable to visit RCPI's premises in person. However, RCPI provided the panel with an effective virtual tour of their on-site facilities and have a track record of providing programmes of education and training accredited by the Medical Council using these environments. The panel is therefore satisfied that these are appropriate environments for any on-site learning that may be required within the suite of programmes the College intends to pursue QQI validation for.

6	ASSESSMENT OF LEARNERS

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines under this dimension of QA require providers to incorporate procedures within the assessment framework for the integrity and credibility of assessment processes. RCPI's Assessment Policy sets out guiding principles for programme assessment plans, the provision of formative feedback and the provision of information regarding assessment to learners. The principles of constructive alignment are highlighted within these principles, and reference is made to the range of learning outcomes that may be relevant within the domain (i.e. cognitive, affective or psychomotor domain). Procedures focused on the results approval process, the functioning of the Examination Board and the appointment and role of External Examiners are also included in this section of the QA procedures. During the site virtual site visit, the panel sought to understand how the principles stated within the Assessment Policy were enacted in practice at RCPI, and how they informed processes or procedures for the development of assessment tasks, briefs or materials. Thew panel advised that an overarching assessment strategy could usefully highlight assessment of/as/for learning at the College. The panel was of the view that although there is significant experience and expertise guiding this at RCPI, this important area of practice needed to be further documented and formalised in the QA procedures. The panel therefore issued a *Mandatory Change* (7.1.5) pertaining to this in this report.

The panel noted that the alignment of processes for assessment rechecks, reviews and appeals to the guidance provided in Assessment and Standards, Revised 2013 is also relevant to this dimension of QA. This has been discussed in Section 5.2 and is addressed in *Mandatory Change* 7.1.3.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed its initial concerns by providing further policy and procedure documentation pertaining to assessment.

7	SUPPORT FOR LEARNERS

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines under this dimension of QA require providers to ensure that all resources are fit for purpose, accessible to learners and responsive to the needs of the programme. Moreover, learner resources and supports should be as integrated as possible, and actively promoted to learners. During the site visit, the panel discussed the range of learner supports and resources that RCPI planned to provide with the College's representatives. The panel held concerns that the supports proposed by RCPI were not adequate to the needs of the full range of potential learners within the programmes they propose to validate. For example, RCPI proposed that enrolled learners will be able to access library resources through their employment in the HSE, but did not account for the potential for learners who are not HSE staff or are taking career breaks to participate. Another example pertains to Pastoral Care. RCPI's documentation indicated that mental health supports would be provided via the College's Physician Wellbeing Programme launched in 2019. However, this service is identified as being for doctors, and does not cater to the wider range of healthcare professionals the proposed programmes will be open to. The College's representatives stated that the Policy for International Learners was not yet completed and noted that while some trainees came from other jurisdictions, most were resident in Ireland. Moreover, the College routinely accommodates learners' specific requirements due to cultural or religious preferences. The panel held the view that this policy and associated supports or services are important aspects of RCPI's QA that offer the College an opportunity to formalise its enactment of inclusivity in practice.

QQI's guidelines also require that the adequacy of resources available to learners must be monitored on an on-going basis, and learners surveyed at least annually for their impression of learning resources and supports. During their initial review of the documentation, the panel were unable to identify where learner feedback on this aspect of practice within the College was gathered. A sample evaluation form provided to the panel made a general reference to facilities, but did not survey learners for their views on, for example, IT support, library resources, academic supports or pastoral care services. The panel

advised that RCPI could usefully consider working with learners to develop services that target identified needs.

The panel issued a *Mandatory Change* (7.1.6) and *Specific Advice* (7.2.3) pertaining to this dimension of QA in this report.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed its initial concerns pertaining to learners supports that would account for the full diversity of the cohort. RCPI presented a significantly expanded and more detailed range of learner support QA procedures and associated resources for review.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The Panel is of the view that RCPI has met QQI's requirements with regard to this dimension of QA.

Staff at RCPI are inducted to GDPR obligations during their induction to the organisation, and refresher training is also provided in follow up. Reportable breaches have occurred and have been appropriately responded to with organisation wide training sessions and communications to all staff.

Data management is an area of continual improvement, and the College is in the process of transitioning to a centralised data system that will better enable RCPI to analyse and process data effectively to inform decision-making.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The Panel is of the view that RCPI has met QQI's requirements with regard to this dimension of QA.

RCPI has committed to providing prospective learners with appropriate information prior to their commencement of any programme and before accepting any payment from or on behalf of an enrolled learner. Learners will be notified in writing of key information, including the name of the awarding body, the programme title and the award to which it leads, whether the award is recognised within the NFQ,

procedures for access, transfer and progression that apply to the programme the details of any PEL arrangements in place.

10   OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of RCPI's draft QA was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

Of particular relevance to the College's application for Initial Access to Validation was RCPI's newly developed Policy for Partnership and Collaboration in Continuing Education. This policy set out broad principles for the College's potential arrangements with external partners and second providers. RCPI has applied to be approved for Collaborative Provision as a first provider within Ireland. While acknowledging the existence of the aforementioned policy, the panel were of the view that more substantial and detailed processes were required to facilitate this. The panel issued a *Mandatory Change* (7.1.7) and *Specific Advice* (7.2.4) pertaining to this dimension of QA in this report.

RCPI is a well-regarded and well-established provider of programmes of education and training within its domain, and engages with numerous stakeholders, including the Department of Health and the Health Service Executive as well as members, trainees, fellows, clinicians and senior healthcare managers. The College is a member of the Forum of Postgraduate Training Bodies in Ireland and is active in collaborative research undertakings with other academic institutions and medical schools including UCC, UCD and TCD. The Road Safety Authority (RSA) provides funding for the Traffic Medicine Programme, which is supported by a partnership agreement between RCPI and the RSA. RCPI's Basic and Higher Specialist Training programmes are accredited by the Medical Council. RCPI is also the host institution for National Clinical Care programmes which are funded by the Department of Health. RCPI also has MOUs in place for the delivery of examinations services to multiple countries and training jurisdictions, include Oman, India and Hong Kong. Given the extensive range of relationships RCPI manages, processes for the management of potential Conflicts of Interest are of significant importance. During the site visit, the panel discussed with RCPI how these were managed. RCPI noted that strict guidelines were in place, including a Conflict of Interest Policy (Appendix 17), and, for example, in relation to sponsorship or funding from the

pharmaceutical industry. The panel acknowledge that these and other potentially relevant processes may be in place, but not included in the documentation submitted. However, the panel were of the view that documentation in relation to this area could be further developed. The panel issued a *Mandatory Change* (7.1.8) pertaining to this.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed its initial concerns pertaining to sufficiently detailed policies and procedures for collaborative provision. RCPI submitted a collaborative provision policy, procedure and strategy document for review.

11　　　　SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

The Panel is of the view that RCPI has met QQI's requirements with regard to this dimension of QA.

During the virtual site visit, this dimension of QA was explored with the College's representatives. It was evident to the panel that there is a commitment to self-evaluation and continual enhancement within the College. The implementation of changes to the governance structures in the College are a reflection of this.

The panel is of the view that the processes for self-evaluation, monitoring and review activities at RCPI will benefit from the greater involvement of learners, and this has been discussed in Section 5.2. The panel notes that the implementation of a centralised data management system at the College will also help to facilitate this aspect of RCPI's QA procedures.

12　　　　TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING

Panel Findings:

At the time of the virtual site visit, the panel was of the view that some further development of this aspect of RCPI's draft QA was needed in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines in relation to this dimension of QA require processes to take into account the organisational context (including strategy, infrastructure and resources), the programme context (including the pedagogic context, learning outcomes, learning materials, delivery mechanisms and approval processes) and the learner experience context (including supports and equality of opportunity).

RCPI's Online and Blended Learning Procedure outlines curriculum development processes, and references learner access to supports when problems are encountered as well as faculty induction, support and training. Learners have access via RCPI Helpdesk to appropriate supports for a range of IT, administrative and programme content related queries. However, the panel were of the view that this area of the documented QA could be further developed at RCPI to ensure consistency. This would make more visible within the processes how RCPI ensure that technology is in the service of pedagogy, how instructional design and pedagogic principles inform development, how learning technologists collaborate with the academic subject-matter experts and how online and blended approaches are specifically

evaluated by students. The panel issued a *Mandatory Change* (7.1.9) and *Specific Advice* (7.2. 5) pertaining to this.

The panel reconvened on March 30 and conducted a desk review of the revised QA procedures submitted by RCPI. The panel noted that RCPI had addressed its initial concerns by revising the documentation submitted for this area. The panel identified an item of Specific Advice for RCPI in relation to this dimension of QA as it moves forward.

Evaluation of draft QA Procedures - Overall panel findings

As stated in Section 3.1 of this report, the panel commend RCPI for pursuing an application for Initial Access to Validation (IAV) with QQI, with a view to ensuring the College's members benefit from recognition of their qualifications within the European Credit Transfer and Accumulation System (ECTS). The panel also acknowledge the substantial work undertaken by RCPI in preparing the documentation required for the application.

At the conclusion of the virtual site visit the panel was not in a position to immediately recommend approval of RCPI's draft QA procedures due to a lack of alignment between practices in specific areas of RCPI's QA systems and QQI's guidelines. However, the panel was confident that RCPI was capable of implementing the necessary changes to address this within a period of six months. The panel was of the view that the adjustments required would strengthen RCPI's QA processes, and also ensure the College is well-prepared to engage with QQI at the point of programme validation.

The panel reconvened on March 30 to conduct a desk review of the revised QA procedures submitted by RCPI. The panel were of the view that RCPI had undertaken a significant amount of work in the interim period, which represented a constructive engagement with the panel's initial feedback and had resulted is substantially improved documented QA procedures. The panel commended RCPI for its engagement with the process and was pleased to recommend approval of RCPI's QA procedures to QQI.

Part 6 Conditions of QA Approval

6.1.1   Within the Programme Development Policy (ED-Pol-026), RCPI must update its indicated approvals to reflect that the Academic Board has the authority to approve the development of a new programme in relation to its academic appropriateness only, and does not wield 'ultimate authority'. The final approval to proceed, following Academic Board approval, must rest with the commercial decision-making body as there are resource and financial implications associated with that decision, and this must be reflected in the documented procedure.

Part 7 Mandatory Changes

The panel reconvened on March 30 2021 and conducted a desk review of the revised QA procedures of RCPI. The panel was satisfied that RCPI has satisfactorily implemented the mandatory changes reflected below, which were issued at the time of the initial virtual site visit.

7.1.1   Within its governance structure, the College must establish a unit (i.e. board or committee) of academic governance. This must have terms of reference that exclusively focus on developing, protecting and maintaining the academic standards of the College, and must not be involved in commercial decision-making (for example, considering the financial viability of/business case for new programmes). This committee or board must report directly to the Council, must have substantial representation of academic staff within the College and must have learner representation. The panel notes that this could be achieved at RCPI through a reorientation of the current Executive Board and Education and Quality Committee. It could also be achieved through the establishment of a new committee if this is preferred.

7.1.2   The College must further develop processes for learner representation across the governance structure and work to incorporate learners into formal self-evaluation, monitoring and review processes within the organisation (for example, through class liaisons or representatives). The involvement of learners in the College's processes should be clearly and consistently represented in the QA documentation.

7.1.3   The College must undertake a review of the QA documentation presented to ensure it includes updated tracking or control measures, and provides accurate and current information about the structures and processes of the College. Further the College must ensure that the processes within the manual consistently align to QQI's documented requirements, as set out in the Core Statutory Quality Assurance Guidelines (2016), Assessment and Standards (Revised 2013) and the Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes (2018).

7.1.4   The College must develop its documented processes for the performance management and Continuing Professional Development of Faculty. The panel acknowledges that the College currently provide support to faculty in these areas. However, RCPI must document and present a

set of contextually appropriate processes that promote quality and ensure the transparency and strategic alignment of its practices in this area.

7.1.5   The College must include an overarching assessment policy in its documentation, which makes explicit the QA processes around this area of practice.

7.1.6   The College must further develop its learner supports to account for the full diversity of the cohort, and present appropriately comprehensive documentation to reflect this. This is particularly important in relation to library resources and pastoral supports. The College must also make clear where and how learner feedback is sought on the quality and adequacy of the supports provided.

7.1.7   The scope of provision that the College has applied for includes collaborative provision within Ireland as a first provider. To achieve this, the College must substantially elaborate the policy and procedures it has presented pertaining to collaborative provision.

7.1.8   The College must review its documentation in relation to relationships with external bodies, including documentation and processes for managing Conflicts of Interest and dealing with external stakeholders.

7.1.9   While acknowledging that the College have Blended Learning processes in place, these must be revised to more clearly integrate reference to pedagogy, instructional design and the collaborative process between academic stakeholders and learning technologists.

7.2 Specific Advice

The panel reconvened on March 30 2021 and conducted a desk review of the revised QA procedures of RCPI. The panel noted that RCPI has addressed much of the specific advice listed below. The panel identified one further item of specific advice at that time (7.2.6).

7.2.1   The College should ensure the full governance and management structure is presented within a chapter of the QA Manual designated for this purpose. This must include terms of reference for all units of governance, and a description of the relationships between these. Individual role descriptions for management staff and an organisational chart that reflects reporting lines should also be included. Flowcharts or graphics should accompany the description of key processes where appropriate.

7.2.2   The College should consider how issues raised in learner feedback may be triangulated, and how RCPI may 'close the loop' by informing learners of actions taken in response to the feedback they provide.

7.2.3   RCPI is encouraged to consider what innovative approaches could be taken to provision of resources for learners.

7.2.4   The College is advised to seek advice from on QQI on the scope of documentation that would be expected to support an application for a scope of provision that includes collaborative provision, as a first provider.

7.2.5   The College is advised that in addressing Mandatory Change 6.1.9, the panel suggests the text currently written in the certificate document be referred to and used to inform a broader institutional policy.

7.2.6   The College is advised that the panel encourage further development of online and blended learning pedagogy within RCPI's policies and procedures to ensure alignment with emerging best practices in this area.

Part 7   Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
9	Major, SPA, Minor	Healthcare
Face to Face & Blended Learning; Part-time; Collaborative Provision as a First Provider		

Part 8   Approval by Chair of the Panel

This report of the Quality and Capacity Panel is approved and submitted to QQI for its decision on the recommendation to approve the draft Quality Assurance Procedures of provider and approve its progression to Stage 2 of the initial programme validation process.

A. D. Walmsley

Name: Professor AD Walmsley

Date: 12th May 2021

Annexe 1:   Documentation provided to the Panel in the course of the Evaluation

Document	Related to
No additional documentation was provided to the panel during the virtual site visit.	

Annexe 2:   Provider staff met in the course of the Evaluation

Name	Role/Position
Dr Mary Horgan	President
Dr Terry McWade	CEO
Ms Yvette Fitzgerald	Manager, Quality Assurance and Corporate Risk
Dr Ann O'Shaughnessy	Head of Professional Affairs
Ms Tracey Douglas	Education Specialist
Ms Edel Hynes	Learning Technologist
Dr Sinead Murphy	Director of Education
Ms Ciara McGurry	Postgraduate Medical Education Centre Manager
Siobhan Creaton	Head of Public Affairs and Advocacy
Ms Sheila Gallagher	Head of Finance, ICT and BSP
Dr Philip Crowley	National Director, National Quality Improvement Team, HSE
Dr Mary Browne	Assistant National Director, National Quality Improvement Team, HSE
Dr John Fitzsimons	Clinical Director for Quality Improvement, HSE and faculty member at RCPI

Ms Vicky Taylor	Quality Improvement Manager
Ms Joan Phelan	Education Consultant
Ms Emma Cuddihy	Programme Manager, Governance
Mr Michael Hughes	Manager, Digital Technologies Office

Appendix*:* Provider response to the Initial Access to Validation Panel Report

10 May 2021

Prof. Damien Walmsley, Panel Chair,
C/O Dr. Deirdre Stritch,
Quality and Qualifications Ireland (QQI),
26/27 Denzille Lane,
Dublin 2,
D02 P266.

Re: Application for Initial Access to Validation

Dear Prof Walmsley,

Thank you to the panel for the Quality and Capacity Evaluation report in respect of the Royal College of Physicians of Ireland (RCPI) application for Initial Access to Validation (IAV) with QQI.

We would like to thank QQI and the appointed panel for the work undertaken in reviewing and evaluating RCPIs Quality Assurance Manual and related documentation submitted as part of our Initial Access to Validation application. We valued the engagement and discussion at the virtual site visit and the clarity provided in terms of the required changes to be implemented within the six-month period.

Following receipt of the panel's report on August 2020 we engaged in a period of reflection on the mandatory changes recommended and a thorough review of our structures, policies, and procedures. The period given to consider the panel's recommendations has, we believe, allowed time for a deep engagement with the QQI's Core Statutory Quality Assurance Guidelines and supporting documents and facilitated a detailed alignment of our documented quality assurance system with the principles contained therein.

The RCPI Council, Executive Board, Academic Board and Senior Management Team are committed to the provision of high-quality innovative education programmes. They have supported cross-functional staff across RCPI, together with the Quality Assurance and Corporate Risk Manager, to engage in the review of policies and processes as presented in the Quality Assurance (QA) Manual and approved by the Academic Board.

This process of reflection and review has produced new structures and new documentation which are being implemented on an ongoing basis, at the appropriate juncture in the academic year.

Robust academic governance is in place with a new Academic Board established, together with Programme Boards and Exam Boards. These bodies now contain learner representation and together with the developments we have made to our Programme Monitoring, Review and Self-Evaluation processes will ensure the formal incorporation of learners and learner feedback in our decision-making processes.

Frederick House, 19 South Frederick Street, Dublin 2, D02 X266, Ireland
t: +353 1 863 9700   f: +353 1 672 4707   e: college@rcpi.ie   w: rcpi.ie

Registered Charity in Ireland Ref. CHY1897

We have taken this opportunity to enhance our resources and supports for learners with the appointment of a Student Support Officer and the provision of remote library access to key books and articles as well as easily accessible information on RCPIs education programmes, relevant policy and procedure documents, and a dedicated webpage for Learner Resources and Supports. In recognition of the unique partnership that exists between our Faculty and staff engaged in the development and delivery of education programmes, we have reviewed and formalised a number of our policies and procedures and added to the supports provided to Faculty, outlined on a dedicated webpage for Faculty Resources and Supports.
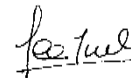
We have comprehensively developed our policy and procedure in respect of Collaborative Provision and set out the context, guiding principles, framework of responsibilities, structures, and processes related to this.

We would like to thank QQI and the appointed review panel for the opportunity to complete this reflection and review process to implement the panel's recommendations in respect of the mandatory changes and specific advice. This process has been very valuable for our organisation, and most importantly learners enrolled on RCPI's education programmes, as well as faculty and staff involved in the development and delivery of these programmes.

Yours sincerely,

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Professor Mary Horgan   Dr. Terry McWade
President   Chief Executive Officer

Cc:
Dr. Sinead Murphy – Chair, Academic Board
Dr. Ann O'Shaughnessy – Head of Professional Affairs

Frederick House, 19 South Frederick Street, Dublin 2, D02 X266, Ireland
t: +353 1 863 9700   f: +353 1 672 4707   e: college@rcpi.ie   w: rcpi.ie

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